

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

MARTA GARCIA AND OSCAR GARCIA)	
)	
Plaintiffs,)	
)	
-vs-)	CAUSE NO.: 15CV-440-WCL-APR
)	
LQ PROPERTIES, INC., d/b/a LA QUINTA INN)	
LAREDO and d/b/a LA QUINTA INNS &)	
SUITES, LQ MANAGEMENT LLC, d/b/a LA)	
QUINTA INN LAREDO and d/b/a LA QUINTA)	
INNS & SUITES, and BRE/LQ PROPERTIES)	
LLC, n/k/a LQ PROPERTIES, LLC/d/b/a LA)	
QUINTA INNS AND SUITES and d/b/a LA)	
QUINTA INN LAREDO)	
)	
Defendants.)	

**MOTION FOR ADDITIONAL EXTENSION OF TIME TO RESPOND
TO DEFENDANT'S RULE 12(b)(2) MOTION TO DISMISS**

Come now Plaintiffs, by counsel, Wanda E. Jones of Jones Law Offices,
and respectfully request that the Court grant additional time for Plaintiffs to respond
to Defendant's Rule 12(b)(2) motion to dismiss, and in support thereof advise this Court
as follows:

1. Defendants filed the pending motion to dismiss on January 7, 2016, so
that pursuant to N.D. Ind. L.R. 7-1 Local Rule making Plaintiffs' response due
on or before January 21, 2016;
2. On January 8, 2016, the undersigned counsel filed a motion for extension
of time to respond to the pending Rule 12(b)(2) motion, which motion was
granted by the Court, making same due on or before February 4, 2016.

3. Despite diligent efforts by the undersigned counsel the response is not finalized, and additional time is needed. The undersigned counsel was absent from her office on an intermittent basis beginning July 1, 2015 through December 31, 2015 due to her husband's ongoing treatment for Stage IV lymphoma, and since her return on a full time basis she has been extraordinarily busy catching up with various cases, and has not had the opportunity to complete the plaintiffs' response.
4. The undersigned counsel has communicated with counsel for the defense, Attorney James Hinshaw, who has no objection to an additional two week extension of time for the Plaintiffs to respond.

WHEREFORE, for all the above-captioned reasons the undersigned respectfully requests this Court grant an additional extension of time of two weeks for the Plaintiffs to respond to the pending Rule 12(b)(2) motion to dismiss, making same due on or before February 18, 2016, and for all other just and appropriate relief in the premises.

Respectfully submitted,

/s/ Wanda E. Jones

Wanda E. Jones

Attorney for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of February, 2016, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system

James M. Hinshaw – jhinshaw@bgdlegal.com

Joshua J. Burress – jburress@bgdlegal.com

/s/ Wanda E. Jones

Wanda E. Jones

Attorney for Plaintiffs

JONES LAW OFFICES